

REMARKS/ARGUMENTS

Favorable reconsideration of this application in light of the following discussion is respectfully requested.

Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 are pending in the present application.

Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 are amended by the present amendment and

Claims 4-11, 13-16, 19, 21-23, 28-35, 37-40 and 44-63 are previously withdrawn. Support for amendments to the claims can be found in the disclosure as originally filed, at least in Figure 6 and corresponding disclosure. Thus, no new matter is added.

In the outstanding Office Action, Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 were rejected under 35 U.S.C. §102(e)<sup>1</sup> as unpatentable over Suzuki (U.S. Pat. Pub. No. 2003/0156184).

Addressing now the rejection of Claims 1-3, 12, 17, 18, 20, 24-27, 36, 41-43 under 35 U.S.C. §102(e) as anticipated by Suzuki, that rejection is respectfully traversed.

Claim 1 recites, in part,

An image forming apparatus that forms an electrostatic latent image on a medium to be scanned by laser beams, which are projected from a plurality of laser light sources and periodically deflected by a rotational deflecting unit, so that the laser beams scan the medium, which is uniformly charged and moving in a sub-scanning direction, in a main-scanning direction perpendicular to the sub-scanning direction, the image forming apparatus comprising:

a pixel clock generating unit that generates first and second pixel clocks, which are used for controlling timings of projection of said laser beams, separately for each of said laser light sources, and for performing a phase change of each of said first and second pixel clocks; and

a phase control unit that controls said first pixel clock independent of said second pixel clock and controls said second pixel clock independent of said first pixel clock.

---

<sup>1</sup> The outstanding Action rejects the claims under §102(b) however, Applicants believe the outstanding Action intended to cite §102(e). Note that the filing date of the present application is 2/25/2004 and the publication date of Suzuki is only 8/21/2003.

Claims 17, 24 and 41 recite similar features regarding control of the implementation of phase change in each of the first and second pixel clocks.

Suzuki describes an optical scan device that includes a pixel clock. In addition, Suzuki describes a phase adjustment method for adjusting the pixel clocks.

However, Suzuki does not describe or suggest a phase control unit that controls said first pixel clock independent of said second pixel clock and controls said second pixel clock independent of said first pixel clock, as is recited in Claim 1.

The outstanding Action states on page 6 in the response to arguments section that

Applicant argues that "a phase control unit that controls independently each of the said pixel clocks" is not taught in the prior art. The gist of applicant's argument appears to be that the pixel clocks can be controlled independent of each other. The example given by applicant is that second phase change data can be used to adjust a second pixel clock in a different way independent of any modification to the first pixel clock.

However, this is not stated in the claims. An independent phase control unit is what is stated in the claims, and the comparator is an independent unit. It can communicate with other aspects of the clock generation circuitry but alone it controls the actual pixel clocks. This is how the claim is being interpreted.

In response Applicants have amended Claim 1 to recite that the phase control unit controls said first pixel clock independent of said second pixel clock and controls said second pixel clock independent of said first pixel clock. Thus, this claim now clearly recites that the pixel clocks are controlled independent of each other.

Thus, in a non-limiting example, first phase change data can be used to adjust a first pixel clock while second phase change data can be used to adjust a second pixel clock in a different way, independent of any modification to the first pixel clock. This feature is simply not described or suggested in Suzuki.

In Suzuki the implementation of phase change to the clocks 1 and 2 is controlled by a comparison value generation circuit 9 in an associated fashion and not independently.

Specifically, as is noted in Table 2 of Suzuki, comparison value 1 is pegged to comparison value 2. One set of phase data is used to determine the comparison values which are used to modify both clock 1 and clock 2.

Thus, the comparison value generation circuit 9 cannot be interpreted as equivalent to the phase control unit recited in Claim 1, as the comparison value generation circuit 9 does not control a first pixel clock independent of a second pixel clock and control the second pixel clock independent of the first pixel clock.

Therefore, as Suzuki does not describe or suggest the features of the claimed invention, Applicants respectfully submit that Claim 1, and similarly Claims 17, 24 and 41 and claims depending therefrom, patentably distinguish over Suzuki.

Consequently, for the reasons discussed in detail above, no further issues are believed to be outstanding in the present application, and the present application is believed to be in condition for formal allowance. Therefore, a Notice of Allowance is earnestly solicited.

Should the Examiner deem that any further action is necessary to place this application in even better form for allowance, the Examiner is encouraged to contact the undersigned representative at the below listed telephone number.

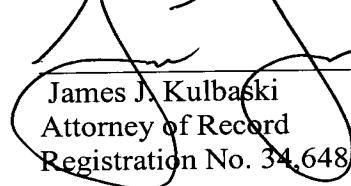
Respectfully submitted,

OBLON, SPIVAK, McCLELLAND,  
MAIER & NEUSTADT, P.C.

Customer Number

**22850**

Tel: (703) 413-3000  
Fax: (703) 413 -2220  
(OSMMN 08/07)



James J. Kulbaski  
Attorney of Record  
Registration No. 34,648

James Love  
Registration No. 58,421